



Oregon

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February xx, 2018

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Mr. Robert J. Wyatt
NW Natural
220 NW Second Avenue
Portland, OR 97209

RE: Draft Stormwater Source Control Measures and Performance Monitoring Work Plan,
NW Natural "Gasco" Site, Portland, Oregon - ECSI# 84

Dear Bob:

The Department of Environmental Quality (DEQ) reviewed the Draft Stormwater Source Control Measures and Performance Monitoring Work Plan (Draft SCM Plan) for the NW Natural Gasco Site, dated January 5, 2018 and prepared by Anchor QEA, LLC, on behalf of NW Natural. DEQ also provided the Draft SCM Plan to EPA and the City of Portland for their review and comments.

DEQ found the SCM Plan to be responsive to DEQ's request to retitle, restructure and revise NW Natural's Draft Source Control Evaluation Report, dated June 20, 2017, in consideration of comments presented in DEQ's letter dated August 4, 2017. DEQ appreciates NW Natural's diligence in ensuring previous comments were adequately addressed and actions proposed are appropriate to improve site conditions in conjunction with NPDES 1200Z permit requirements, as measured by the proposed effectiveness demonstration plan. Please finalize the SCM Plan in consideration of the comments below.

Comments

1. Figure 2.6 Site Subsurface Utilities and Seasonal High Groundwater Elevations – Koppers Lease Area: While the text in Section 2.4.2 includes the estimated elevation of the CMP outfall in the upper swale as the lowest potential stormwater infrastructure in the area leading to Doane Creek, this elevation is not provided on Figure 2.6. Please include this estimated elevation to improve interpretation of the potential for preferential transport of contaminated groundwater to Doane Creek.
2. Section 4.1.2 Design Considerations: Text in this section refers the reader to Section 4.7 for information on timing of source control measures design and implementation. Timeline information appears in Sections 4.6 and 4.8. Please correct.
3. Section 5.3 Adaptive Management: Based on site stormwater and stormwater solids data collected to date, DEQ's letters on site stormwater source control dated July 15, 2016 and August 4, 2017 requested development of stormwater source control measures for basins C and D. DEQ appreciates

that the proposed regrading, resurfacing, infiltration enhancements and pipe repair, cleaning and retrofit described in Section 4 are likely to reduce stormwater volumes and improve stormwater quality from within these basins. DEQ acknowledges statements in Sections 3.4.1.1 and 3.4.1.2, which indicate that additional stormwater monitoring data, following implementation of source control measures, will be needed to understand whether additional source tracing or measures are needed in basins C and D. While DEQ supports the Section 5.1.2 approach to use data collected for both 1200Z permit and source control purposes, DEQ cautions that effective source tracing may not be achievable using data collected at the outfall where discharges from both basin C and D coningle. Additional stormwater sampling from points where basin discharges can be distinguished, stormwater solids sampling or other media sampling may be needed. Please acknowledge the potential for additional source tracing in this section.

4. Table 5-1 Stormwater SCM Monitoring and Effectiveness Demonstration Measures: Regrading and resurfacing is proposed for application in area other than the shoreline.
 - a. Please expand the objective and effectiveness indicators of this SCM inclusive of all areas where it will be applied.
 - b. Please revise the effectiveness indicator for shoreline areas to be “no observed overland flow discharges over an entire water year with comparable precipitation and saturation conditions as the 2016-17 water year when initial observations were made.”
5. Section 5.4 Effectiveness Demonstration Indicators: Please include a description of interim and final reports on these indicators to be submitted to DEQ for review and approval prior to implementation of adaptive management measures or additional source tracing or other actions necessitated by effectiveness demonstration information. At a minimum, the report(s) should include the results of dry weather observations at infrastructure with potential to preferentially transport contaminated groundwater to the Willamette River or Doane Creek; wet weather observations at abandoned infrastructure components; overland flow observations; stormwater monitoring results; source tracing proposals, as warranted; and adaptive management options.

Provided all above comments are incorporated, DEQ approves the final SCM Plan. Please feel free to contact me with questions about this letter or the source control process at liverman.alex@deq.state.or.us or 503-229-5080 or at the address on this letterhead.

Sincerely,



L. Alexandra Liverman
Portland Harbor Stormwater Coordinator

cc: Patty Dost, Pearl Legal Group
Todd Thornburg, Anchor
Ben Hung, Anchor
Rob Ede, Hahn and Associates, Inc.
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